

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**In re:**

**ANDREW JACKSON MARTIN  
Debtor**

**Case No. 14-13715-RGM  
Chapter 13**

**OBJECTION TO CLAIM NO 2  
NOTICE OF OBJECTION TO CLAIM  
AND  
NOTICE OF SCHEDULED HEARING ON THIS OBJECTION**

**Claim Filed As**  
Secured

**Claim No.**  
2

**Claimant**  
United Consumer Financial Services  
c/o Bass & Associates, P.C.  
3936 E. Ft. Lowell, Suite 200  
Tucson, AZ 85712

Andrew Jackson Martin, debtor, hereby objects to Claim No. 2 in the total amount of \$1124.88, of which \$882.00 has been filed as secured in this Bankruptcy case on the following grounds:

The said Kirby Cleaning System is not in the debtor's possession, it was given away as a gift. Therefore this should be a general unsecured non priority claim, the claim/debt is a simply unsecured. The debtor asks that claim No. 2 be treated as general unsecured non priority claim.

**YOUR CLAIM MAY BE REDUCED, MODIFIED OR ELIMINATED. You should read these papers carefully and discuss them with your attorney, if you have one.**

If you do not want the court to eliminate or change your claim, then on or before five business days prior to the hearing date, you or your attorney must:

File with the Court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the objection as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the Court will receive it on or before five business days prior to the scheduled hearing. You must also mail a copy to the parties listed below.

Attend the hearing to be held on **June 10, 2015 at 9:30 a.m., in Courtroom I on the 2nd floor, United States Bankruptcy Court, 200 South Washington Street, Alexandria VA 22314.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

Clerk of Court  
United States Bankruptcy Court  
200 South Washington Street  
Alexandria, Virginia 22314

Janet E. Boyd, Esq.  
385 Garrisonville Rd., Suite 203  
Stafford, VA 22554

Thomas P. Gorman, Esq.  
300 N. Washington St. Ste 400  
Alexandria, VA 22314

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the objection to your claim and enter an order reducing, modifying or eliminating your claim.

Respectfully Submitted,

/s/Janet E. Boyd

Janet E. Boyd, Attorney At Law PLC  
Janet E. Boyd, Esq. VSB No.: 67979  
Phone No.: 540-288-9559  
Fax No.: 540-288-3227  
*Counsel for Debtor*

#### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Objection to Claims, Notice of Objection, and Notice of Hearing was sent via first-class mail, or via the courts electronic filing system, this 12<sup>th</sup> day of May 2015 to all necessary parties of interest to include:

Thomas P. Gorman  
300 N. Washington St. Ste 400  
Alexandria, VA 22314

Office of the U.S. Trustee  
115 South Union St. Ste. 210  
Alexandria, VA 22314

United Consumer Financial Services  
c/o Bass & Associates, P.C.  
3936 E. Ft. Lowell, Suite 200  
Tucson, AZ 85712

/s/Janet E. Boyd  
Janet E. Boyd